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November 15, 2006

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 05-196

Filing of FCC VoIP 911 Compliance Letter

This letter is to confirm to the FCC that we are deploying the Dash911 E911 for VoIP solution, specifically designed for VoIP and which uses Intrado as a 911 call routing backbone. Dash911 and Intrado have delivered detailed coverage information to the FCC.

We plan to offer VoIP service in the following areas: **nationwide**

The V9-1-1™ solution enabled by Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers. The solution provided by the Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Dash 911 thereby enabling VSPs to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Dash911 via a real-time interface and the PSTN connectivity to the Dash911 network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API programming interface supplied by Dash 911 to its VSP customers, or, a branded website interface provided by Dash911 to it's VSP customers.

- 911 Routing Information/Connectivity to Wireline E911 Network:

  Currently through the assistance of our Network providers, each of Dash911's VSP customers will have access to more than 454 E9-1-1 Selective Routers. The FCC has on file the "Major Market Deployment Map" and the "VoIP Deployment Plan" which reflects the major market deployment schedules. Note: the Market Deployment Map represents major markets where Intrado has reported to Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

- **Transmission of ANI and Registered Location Information:**

Our 9-1-1 service will transmit via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. We will provide to all of our customers 9-1-1 service based on the level of service provided to us by Dash911 E911 for VoIP service.

- **Basic PSAP:** Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic 9-1-1 PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance, Intrado reports that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.

- **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Dash911 has indicated that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

  New Jersey - In the State of New Jersey Intrado has obtained permission from the State to deploy a voice-only service which includes the call-taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

  Ohio - To date, Ohio has not granted permission to Intrado to deploy a complete ALI or voice-only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

  Hawaii - To date, Hawaii has not granted Intrado permission to deploy a voice-only solution. The ALI systems serving Hawaii are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

  Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice-only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

- **VSP Specific Metrics - Note to the FCC: Please refer to the confidential VSP coverage Spreadsheet that is on file with the FCC.**

- **911 Coverage**:

- **Deployment Overview** – The Dash 911 E911 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on complete nationwide native VoIP E9-1-1 delivery in accordance with the

Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The *"Major Market Deployment Map",* previously supplied to the FCC, which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Detailed deployment dates are noted in the information supplied to the FCC by Dash911 and Intrado.

Obtaining Initial Registered Location Information:

All subscribers will be required to input their Registered Emergency Service address into our system, in order to provision their emergency calling service.

Obtaining Updated Registered Location Information:

Dash 911, as part of our total 9-1-1 solution, provides at least one way of updating each subscriber's Registered Location. As a component of the Dash911 Service we have access to a near real-time address update system provided to us by Dash911. This allows us to have near real-time delivery of the subscriber's address and also allows us as a VSP to submit a subscriber's address update information directly. The system allows us to have the subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address. VSPs may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Dash911 telephone to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Dash 911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Dash 911 also offers to us, as a VSP, a future product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

Technical Solution for Nomadic Subscribers:

As a VSP using Dash911's E911 for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Dash 911's network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Interenet at a new location/address. Through the Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognize the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Dash 911, along with Intrado, are working a number of "location determination" technologies.

If you have any questions or require additional information, please contact the parties below.

Sincerely,

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Enclosures: Previously submitted to the FCC on our behalf by Dash911

- Coverage Map
- Detailed coverage by PSAP